

EXHIBIT 13

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5)
6) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8 In re: FLINT WATER CASES) (consolidated)
9)
10) Hon. Judith E. Levy
11) Mag. Mona K. Majzoub
12)
13)

14 Thursday, June 25, 2020

15 HIGHLY CONFIDENTIAL

16 VOLUME I

17 Remote videotaped deposition of
18 RICHARD D. SNYDER conducted at the location of the
19 witness in Ann Arbor, Michigan, commencing at
20 9:01 a.m., on the above date, before Carol A. Kirk,
21 Registered Merit Reporter, Certified Shorthand
22 Reporter, and Notary Public.

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1 to act upon them, right?

2 A. Well, they supported one another,
3 Dr. Edwards and Dr. Mona.

4 Q. And, ultimately, once you had some
5 clarity and belief that Miguel Del Toral's
6 assessment and opinions had credibility, you
7 sprinkled that into the sauce that you were
8 making in terms of considering what to do best
9 about Flint as well, correct?

10 A. That was actually after the fact.

11 MR. CAMPBELL: Objection.

12 A. I'd already -- we had already
13 moved ahead, but it helped reaffirm.

14 Q. Okay. And so is it fair to say
15 that if a water quality -- a company that had an
16 expertise in water quality would have ever
17 gotten a message to the governor's office that
18 reconnecting to DWSD for the next two years was
19 the best solution, if there were facts to
20 support that conclusion, is it fair to say that
21 you would have considered those facts and
22 considered taking action?

23 MR. CAMPBELL: Object to the form.

24 A. I think that's an accurate

1 statement.

2 Q. Sitting here today, do you
3 remember anyone ever from Veolia trying to get
4 in touch with you directly or anyone in your
5 office to say, "The best solution for the folks
6 in Flint is to switch back to DWSD"?

7 MR. CAMPBELL: Object to the form.

8 A. I don't recall anything along
9 those lines.

10 Q. And you actually testified very
11 early this morning -- when Mr. Leopold was
12 talking about leadership and how you define it
13 and all of those things, you talked a little bit
14 about having an open door, about allowing people
15 to express their opinions.

16 If somebody from Veolia had
17 approached anyone on your staff who you trusted
18 and the folks on your staff who you trusted came
19 to you and said, "Governor Snyder, you need to
20 hear this," I take it you would have listened?

21 MR. CAMPBELL: Object to the form.

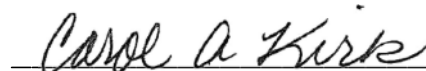
22 A. I would hope so. That would be
23 what I would expect.

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CERTIFICATE

I, Carol A. Kirk, a Registered Merit Reporter and Notary Public in and for the State of Michigan, duly commissioned and qualified, do hereby certify that the within-named RICHARD D. SNYDER was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth in the cause aforesaid; that the deposition then given by him was by me reduced to stenotype in the presence of said witness; that the foregoing is a true and correct transcript of the deposition so given by him; that the deposition was taken at the time and place in the caption specified and was completed without adjournment; and that I am in no way related to or employed by any attorney or party hereto or financially interested in the action; and I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Dexter, Michigan on this 12th day of July 2020.



CAROL A. KIRK, RMR, CSR-9139

NOTARY PUBLIC - STATE OF MICHIGAN

My Commission Expires: August 19, 2022.

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